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6 Attorneys for Defendants
7 THE GAP, INC., a/k/a, GAP, INC., GAP INTERNATIONAL
SALES, INC., BANANA REPUBLIC, LLC, AND OLD NAVY,
8 LLC

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 ROOTS READY MADE GARMENTS CO.
W.L.L.,

14 Plaintiff,

15 v.

16 THE GAP, INC., a/k/a, GAP, INC., GAP
17 INTERNATIONAL SALES, INC., BANANA
18 REPUBLIC, LLC, AND OLD NAVY, LLC

19 Defendants.

Case No. C 07-03363 CRB

**DECLARATION OF DAN JACKSON IN
SUPPORT OF DEFENDANTS' REPLY IN
SUPPORT OF DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT, OR IN
THE ALTERNATIVE, SUMMARY
ADJUDICATION**

Date: August 29, 2008
Time: 10:00 a.m.
Dept: 8
Judge: Honorable Charles R. Breyer

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25 **PUBLIC VERSION**
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1 I, DAN JACKSON, declare and say that:

2 1. I am an attorney licensed to practice law in the State of California and before this
3 Court and am employed by Keker & Van Nest, LLP, counsel for defendants The Gap, Inc., a/k/a,
4 Gap, Inc., Gap International Sales, Inc., Banana Republic, LLC, and Old Navy, LLC
5 (collectively "Gap").

6 2. I have knowledge of the facts set forth herein, and if called to testify as a witness
7 thereto, could do so competently under oath.

8 3. Attached hereto as Exhibit A are true and correct copies of pages from the
9 deposition of Sheikh Faisal Ahmed Al Thani, dated June 4, 2008.

10 4. Attached hereto as Exhibit B are true and correct copies of pages from the
11 deposition of Ashraf Abu Issa, dated June 6, 2008.

12 5. Attached hereto as Exhibit C are true and correct copies of pages from the
13 deposition of Naser Beheiry, dated June 24, 2008.

14 6. Attached hereto as Exhibit D are true and correct copies of pages from the
15 deposition of Ashraf Abu Issa, dated September 10, 2007, taken in the Gabana v. The Gap
16 matter.

17 7. Attached hereto as Exhibit E are true and correct copies of pages from the
18 deposition of Jon Ehlen, dated July 15, 2008.

19 8. Attached hereto as Exhibit F are true and correct copies of pages from the
20 deposition of Ron Young, dated June 5, 2008.

21 Dated: August 15, 2008

KEKER & VAN NEST, LLP

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24 By: /s/ Dan Jackson
25 DAN JACKSON
26 Attorneys for Defendants
27 GAP INTERNATIONAL SALES, INC.,
28 THE GAP, INC., BANANA REPUBLIC,
LLC, and OLD NAVY, LLC